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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Applications in Internet Time, LLC,  
   Plaintiff,  
 v.  
 Salesforce.com, Inc.  
   Defendant.

Case No. 3:13-CV-00628-RCJ-CLB

**STIPULATION TO TAKE  
 DEPOSITIONS AFTER FACT  
 DISCOVERY CUTOFF**

Pursuant to Local Rules IA 6-1 and 26-3, Plaintiff Applications in Internet Time, LLC (“AIT”) and Defendant Salesforce, Inc. (“Salesforce”), by and through their respective counsel of record, hereby stipulate and request that this Court permit the parties to take certain depositions after May 27, 2022 (the deadline for the completion of fact discovery). Due to the personal and work schedules of these fact witnesses, the parties will be unable to schedule all depositions within the current fact discovery schedule. The parties agree permitting these depositions to be taken after May 27, 2022 will ease scheduling, lessen the burden on fact witnesses, and allow a more complete development of the evidence in this action.

The parties have agreed that the following depositions may take place after May 27, 2022:

- Beverly Nelson (AIT principal)
- Scott Hansma (Salesforce Executive Vice President of Engineering)
- Salesforce corporate representative on marketing (up to 2.0 hours)
- AIT Funding LLC (third party)
- Cooley LLP (third party)
- In addition, the parties are discussing whether an additional deposition per side on certain topics, limited to two hours, will also take place, but have not yet reached agreement on whether either of these depositions will be necessary.

DATED: This 27th day of May, 2022.

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DATED: This 27th day of May, 2022.

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**ORDER**

**IT IS HEREBY ORDERED** that the foregoing depositions will be permitted to be taken after the May 27, 2022 deadline for completion of fact discovery.

**IT IS SO ORDERED.**

**DATED:** May 31, 2022.

  
\_\_\_\_\_  
United States Magistrate Judge